

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 114-126, 128-145, 147-155, 157-173, and 175-192 are pending in the application, with claims 114, 133, 153, and 171 being the independent claims. New claims 189-192 are sought to be added. Claims 156 and 174 are sought to be cancelled without prejudice to or disclaimer of the subject matter therein. Claims 114, 116, 117, 120-123, 133, 136, 139-141, 153, 159-162, 171, and 177-181 are sought to be amended. Support for the amendment to independent claims 114, 133, 153, and 171 may be found, for example, at page 41, lines 1-6 of the as filed application. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 103

RIPscrip, Microsoft, and Zellweger

Claims 114, 116-131, 133-150, and 152 have been rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over “RIPscrip Graphics Protocol Specification,” July 19, 1993 (“RIPscrip”) in view of Microsoft Press’ Computer Dictionary, 2nd Edition, 1993 (“Microsoft”), and in further view of U.S. Patent No. 5,630,125 to Zellweger (“Zellweger”). For the reasons set forth below, Applicant respectfully traverses.

To establish a *prima facie* case of obviousness of a claim, each and every claim feature must be taught by the cited references. *See In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); *see also* MPEP § 2143.03. Without acquiescing to the propriety of the combination, RIPscrip, Microsoft, and Zellweger do not teach or suggest each and every feature of independent claim 114, as amended herein. For example, RIPscrip, Microsoft, and Zellweger fail to teach or suggest at least “first computer program code, stored and executable at a user station, for enabling a processor at the user station to select among a plurality of available online services to support an application function, wherein the first computer program code includes an application programming interface (API) that provides a generic client interface capable of communicating a functional request associated with the application function to any one of the available online services,” as recited in claim 114.

RIPscrip is a text based scripting language that may be used to display online graphics and text. (RIPscrip, page 2). Scripts written using the RIPscrip language generate graphics using graphical commands that are organized into levels; where lower levels progressively incorporate more basic graphics primitives. (RIPscrip, page 3). Certain graphical commands within the RIPscrip language, such as the RIP_MOUSE command, may react to a user action (e.g., a mouse click) and, in response, transmit a text string to a host. (RIPscrip, page 32). RIPscrip, however, does not include “an application programming interface (API) that provides a generic client interface capable of communicating a functional request associated with [an] application function to any one of [a] plurality of available online services,” as recited by claim 114.

An API, as noted in the specification of the present application, is a program interconnection technique which supports interaction between one program and another. (*See, e.g., specification*, page 14, lines 17-28, and page 15, lines 1-12). The process of interconnecting one program and another may be simplified by the abstraction provided by an API. In addition, as recited in independent claim 114, an API may provide “a generic client interface capable of communicating a functional request associated with the application function to any one of the plurality of available online services.” RIPscrip does not teach or suggest such a generic client interface provided by an API in any regard.

Moreover, it should be noted that the Examiner appears to have misinterpreted the meaning of an API. Specifically, the Examiner on page 9 of the outstanding Office Action equates a menu, described in RIPscrip, and a GUI, described in Zellweger, with an API. A MENU and a GUI cannot reasonably be considered an API. As noted above, an API is a program interconnection technique which supports interaction between one program and another. (*See, e.g., specification*, page 14, lines 17-28, and page 15, lines 1-12). A menu and a GUI, in complete contrast, permit for direct user interaction with a program and do **not** facilitate or provide an interface for communication between two programs.

Zellweger and Microsoft do not cure the deficiencies of RIPscrip. No where in the Zellweger or Microsoft reference is an API disclosed—or any other comparable interface—which “provides a generic client interface capable of communicating a functional request associated with [an] application function to any one of [a] plurality of available online services,” as recited by claim 114.

For at least the foregoing reason, independent claim 114 is patentable over the combination of RIPscrip, Zellweger, and Microsoft. Dependent claims 116-131 are similarly patentable over the combination of RIPscrip, Zellweger, and Microsoft for at least the same reasons as claim 114, from which they depend, and further in view of their own respective features.

Accordingly, Applicant respectfully requests that the rejection of claims 114 and 116-131 be reconsidered and withdrawn.

Independent claim 133, as amended herein, recites “first computer program code, stored and executable at the user station, for enabling a processor at the user station to select among a plurality of available online services to support an application function, wherein the first computer program code includes an application programming interface (API) that provides a generic client interface capable of communicating a functional request associated with the application function to any one of the available online services.” As noted above in regard to claim 114, the combination of RIPscrip, Zellweger, and Microsoft does not teach or suggest at least this feature. Consequently, claim 133 is patentable over the combination of RIPscrip, Zellweger, and Microsoft.

Dependent claims 134-150 and 152 are further patentable over the combination of RIPscrip, Zellweger, and Microsoft for at least the same reasons as claim 133, from which they depend, and further in view of their own respective features.

Accordingly, Applicant respectfully requests that the rejection of claims 133-150 and 152 be reconsidered and withdrawn.

RIPscrip, Microsoft, Zellweger, and Pettus

Claims 115, 132, and 151 have been rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over RIPscrip, in view of Microsoft, in further view of Zellweger, and in further view of U.S. Patent No. 6,031,977 to Pettus (“Pettus”). For the reasons set forth below, Applicant respectfully traverses.

Without acquiescing to the propriety of the asserted combination, Pettus does not cure the deficiencies of the RIPscrip, Microsoft, and Zellweger references with respect to independent claims 114 and 133 as noted above. Consequently, independent claims 114 and 133 are patentable over the combination of RIPscrip, Microsoft, Zellweger, and Pettus.

Claims 115 and 132 depend from claim 114; claim 151 depends from claim 133. Dependent claim 115, 132, and 151 are patentable over the combination of RIPscrip, Microsoft, Zellweger, and Pettus for at least the same reasons as claims 114 and 133, from which they respectively depend, and further in view of their own respective features. Accordingly, Applicant respectfully requests that the rejection of claims 115, 132, and 151 be reconsidered and withdrawn.

Other Matters

Applicant notes that the Office Action does not specifically reject claims 153-155, 157-173, and 175-188. Indeed, although the Summary of the Office Action indicates that claims 153-155, 157-173, and 175-188 stand rejected, the Detailed Action omits any explanation of how the cited references anticipate or render obvious these claims. Applicant, in an attempt to provide a bona fide response to the present Office

Action, assumes that the above arguments overcoming claims 114-126, 128-145, and 147-152 address claims 153-155, 157-173, and 175-188. Applicant requests the Examiner more specifically address claims 153-155, 157-173, and 175-188 in the next Office Action if the rejection is maintained. Accordingly, reconsideration and withdrawal of the rejection of claims 153-155, 157-173, and 175-188 is respectfully requested.

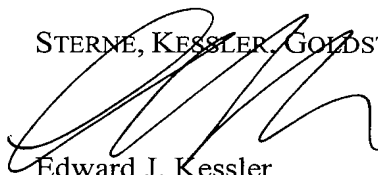
Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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